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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

vs.

HAN NAM CORPORATION, a Commonwealth of
the Northern Mariana Islands corporation,

Defendant.

CASE NO. CV 07-0035

FIRST REQUEST FOR
ADMISSIONS
FROM DEFENDANT

**TO: HAN NAM CORPORATION,
and its attorney of record, STEPHEN J. NUTTING**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, PLAINTIFF hereby requests admissions of the following statements of fact and genuineness of documents. Please produce YOUR written responses to this Request and YOUR particularly stated written objection to a request, if any, to Mark B. Hanson, Attorney at Law, located at the Second Floor, Macaranas Building, Garapan, Saipan, Commonwealth of the Northern Mariana Islands, within thirty (30) days after service of this Request on you.

DEFINITIONS

For the purposes of this Request for Admissions, unless otherwise indicated, the following definitions shall be applicable:

1 1. "YOU," "YOURSELF" "YOURS" or "YOUR" means HAN NAM CORPORATION, its
2 subsidiaries, divisions or affiliates, and its partnerships and joint ventures.

3 2. "PLAINTIFF" means ZHAI LAN JIANG.

4 3. "or" means and/or. "and" means and/or. "each" means each and every.

5 4. "EMPLOYEE(S)" as used herein refers to any PERSON currently EMPLOYED by YOU,
6 hereafter employed by YOU, or formerly employed by YOU. Unless otherwise specified herein, the
7 term includes, but is not limited to: officers, directors, managers, agents, accountants, independent
8 contractors, skilled and unskilled laborers, resident and NONRESIDENT WORKERS.

9 5. "EMPLOYMENT" or "EMPLOYED" or "EMPLOY" as used herein refers to the use or
10 engagement by YOU of services or labor of any kind, regardless of the amount and/or manner of
11 compensation for such services or labor, and regardless of the classification of such services or labor
12 as independently contracted or otherwise.

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14 INSTRUCTIONS

15 1. DUTY TO INVESTIGATE: In responding to this Request for Admissions, YOU must
16 make reasonable investigation of the facts and circumstances relating to the statements of facts and
17 genuineness of documents YOU are asked to admit. YOU cannot give lack of information or
18 knowledge as a reason for failure to admit or deny unless YOU state that YOU have made a
19 reasonable inquiry and that the information known or readily obtainable by YOU is insufficient to
20 enable YOU to admit or deny the requested admission.

21 2. DENIALS: Pursuant to Fed. R. Civ. P. 36(a), a denial shall fairly meet the substance of the
22 requested admission, and when good faith requires that YOU qualify an answer or deny only a part
23 of the matter of which an admission is requested, YOU shall specify so much of it as is true and
24 qualify or deny the remainder.

1 4. Please admit that YOU told PLAINTIFF not to return to work after December 8, 2004.

2
3 DATED this 25th day of January, 2008.

4
5 /s/ Mark B. Hanson

6 MARK B. HANSON

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27 Attorney for Plaintiff ZHAI LAN JIANG

CERTIFICATE OF SERVICE

I certify that the following were served with a copy of the foregoing via the Court's electronic case filing system (CM/ECF):

Stephen J. Nutting
Attorney at Law
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P.O. Box 5093
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DATED: January 25, 2008

/s/ Mark B. Hanson

MARK B. HANSON